

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DAVID WILLIAM WOOD,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 3:15CV594 (MHL)
)	
)	
CREDIT ONE BANK, et al.)	
)	
Defendants.)	

JOINT MOTION FOR EXTENSION OF TIME

The parties, by counsel, move this Court for an extension of time to file their oppositions to dispositive and *Daubert* motions from 5:00 p.m. on September 14, 2016 until 5:00 p.m. on September 21, 2016. Defendant Credit One Bank, N.A.'s lead counsel responsible for drafting these oppositions has been extremely ill and was admitted to the hospital yesterday afternoon.

Accordingly, the parties respectfully request an enlargement of time, for good cause shown, to extend the time for the filing of oppositions until September 21, 2016 at 5:00 p.m.

The time has not expired, this motion is made in good faith, and not for a dilatory purpose.

DATED: September 13, 2016

By: /s/
Lauren M. Cafferty (VSB 83712)
McGuireWoods LLP
2001 K Street N.W., Suite 400
Washington, DC 20006-1040
202.857.1733 (Direct Line)
202.828.3332 (Fax)
lcafferty@mcguirewoods.com

Counsel for Defendant Credit One Bank, N.A.

/s/

Leonard A. Bennett (VSB 37523)
Susan M. Rotkis (VSB 40693)
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, VA 23601

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of September, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to the following:

Leonard A. Bennett
Susan M. Rotkis
Consumer Litigation Associates, P.C.
763 J. Clyde Morris Boulevard, Suite 1-A
Newport News, VA 23601
Counsel for Plaintiff

/s/

Lauren Cafferty (VSB 83712)
McGuireWoods LLP
2001 K Street N.W., Suite 400
Washington, DC 20006-1040
202.857.1733 (Direct Line)
202.828.3332 (Fax)
lcafferty@mcguirewoods.com